

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:

Case No. 08-35653-KRH

CIRCUIT CITY STORES, INC., et al.
Debtors.

Chapter 11 Proceeding
Jointly Administered

**MOTION FOR LEAVE OF COURT TO ATTEND
STATUS HEARING ON JULY 10, 2012 BY TELEPHONE**

PNY Technologies, Inc. ("PNY"), by and through its undersigned counsel, and pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1, hereby moves for leave of Court to attend the July 10, 2012 Status Hearing on the Liquidating Trust's Objection to Claim No. 1723 Filed by PNY Technologies, Inc. [Docket No. 11864] and PNY's Response to the Liquidating Trust's Objection to Claim No. 1723 Filed by PNY Technologies, Inc. [Docket No. 12090] (the "Hearing") by telephone. In support thereof, PNY states as follows:

1. PNY's lead counsel, Michael Reynolds ("Mr. Reynolds"), has a unique and complete understanding of the facts and circumstances related to the matters to be addressed at the Hearing. Mr. Reynolds is based in New Jersey, and he has been granted admission *pro hac vice* in this case.

Michael Reynolds, Esquire (admitted *pro hac vice*)
McCARTER & ENGLISH, LLP
Four Gateway Center
109 Mulberry Street
Newark, NJ 07102
Phone: (973) 849-4188
Facsimile: (973) 624-7070

Neil E. McCullagh, Esquire (VSB #39027)
Jennifer J. West, Esquire (VSB #47522)
Erin E. Kessel, Esquire (VSB #65360)
SPOTTISFAIN PC
P.O. Box 1555
Richmond, VA 23218
Phone: (804) 697-2000
Facsimile: (804) 697-2194

Co-Counsel for PNY Technologies, Inc.

Co-Counsel for PNY Technologies, Inc.

2. PNY respectfully asks for leave of Court so that Mr. Reynolds may appear and participate in the Hearing by telephone to the extent he believes participation is warranted. PNY's Virginia counsel will be present in the courtroom.

3. Based on Mr. Reynold's unique knowledge of the facts and issues in this case, the ends of justice would be served by allowing him to appear by telephone.

WHEREFORE, PNY Technologies, Inc. respectfully requests that this Court grant this motion and enter an Order substantially in the form annexed hereto permitting Michael Reynolds, Esquire to appear and be heard by telephone at the Hearing on behalf of PNY Technologies, Inc. and granting such other relief as necessary and appropriate.

PNY TECHNOLOGIES, INC.

By: /s/ Neil E. McCullagh
Counsel

Neil E. McCullagh, Esquire (VSB #39027)
Jennifer J. West, Esquire (VSB #47522)
Erin E. Kessel, Esquire (VSB #65360)
SPOTTS FAIN PC
P.O. Box 1555
Richmond, Virginia 23218
Phone: (804) 697-2000
Facsimile: (804) 697-2194
Co-Counsel for PNY Technologies, Inc.

and

Michael Reynolds, Esquire (admitted *pro hac vice*)
McCARTER & ENGLISH, LLP
Four Gateway Center
109 Mulberry Street
Newark, NJ 07102
Phone: (973) 849-4188
Facsimile: (973) 624-7070
Co-Counsel for PNY Technologies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2012, a true copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid and/or electronic means on the following, constituting all necessary parties:

Robert B. Van Arsdale
Office of the U.S. Trustee
701 East Broad Street, Suite 4304
Richmond, VA 23219

Lynn L. Tavenner, Esq.
Paula S. Beran, Esq.
Tavenner & Beran, PLC
20 North Eighth Street, 2nd Floor
Richmond, VA 23219

Andrew Caine, Esq.
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Boulevard, 13th Floor
Los Angeles, CA 90067-4100

/s/ Neil E. McCullagh